

## State Water Resources Control Board

November 3, 2015

ExxonMobil Environmental Services Company  
Attention: Mr. Dok Choe  
12851 166<sup>th</sup> Street  
Cerritos, CA 90703  
[Via email only] ([dok.choe@exxonmobil.com](mailto:dok.choe@exxonmobil.com))

Dear Mr. Choe:

CLOSURE DENIAL REVIEW FOR PETROLEUM UNDERGROUND STORAGE TANK CASE,  
FORMER MOBIL #11KKX, 3018 WEST MANCHESTER AVENUE, INGLEWOOD,  
LOS ANGELES COUNTY

State Water Resources Control Board (State Water Board) Resolution No. 2012-0062 requires that State Water Board staff review a lead agency's decision when the lead agency has denied a request by a responsible party for an underground storage tank (UST) case closure pursuant to the Low-Threat UST Case Closure Policy (Policy).

The subject case has the following identification numbers:

- State Water Board, GeoTracker No. T10000001562
- Los Angeles Regional Water Quality Control Board (Los Angeles Water Board), Case No. I-09419B

State Water Board staff reviewed the closure request dated June 17, 2015 and the response from the Los Angeles Water Board. After careful consideration of the GeoTracker record, State Water Board staff agrees with the Los Angeles Water Board staff determination that all of the Policy criteria have not been met. Based on information in the above-referenced GeoTracker record, State Water Board staff finds that the subject case does not meet the following Policy criterion:

- **General Criterion f.** – Secondary source has been removed to the extent practicable.

A soil vapor extraction (SVE) system operated from December 2011 to September 2014 and extracted 133,531 pounds of petroleum constituents. The mass removal rate at shutdown was reported at 16 pounds of petroleum constituents per day. The SVE system was restarted for one day in December 2014 and removed an additional 30 pounds of petroleum constituents. This indicates that a significant quantity of secondary source remains in the subsurface. In the absence of a comprehensive rebound test and/or confirmation borings, it cannot be determined whether the secondary source has been removed to the maximum extent practicable.

Contaminants remaining at the subject site continue to pose a potential threat to human health, safety, and the environment. Criteria for low-threat UST case closure have not been met at this time, therefore closure of the UST case is not appropriate.

If you have any questions, please contact George Lockwood at (916) 341-5752 or [George.Lockwood@waterboards.ca.gov](mailto:George.Lockwood@waterboards.ca.gov).

Sincerely,

  
Victoria A. Whitney, Deputy Director  
Division of Water Quality

cc: Ms. Jung Jun Hong  
19708 Falcon Ridge Lane  
Northridge, CA 91326

[Via email only]

Mr. Samuel Unger, Executive Officer  
Los Angeles Water Board  
([Samuel.Unger@waterboards.ca.gov](mailto:Samuel.Unger@waterboards.ca.gov))

Ms. Paula Rasmussen  
Los Angeles Water Board  
([Paula.Rasmussen@waterboards.ca.gov](mailto:Paula.Rasmussen@waterboards.ca.gov))

Dr. Yue Rong  
Los Angeles Water Board  
([Yue.Rong@waterboards.ca.gov](mailto:Yue.Rong@waterboards.ca.gov))

Dr. Weixing Tong  
Los Angeles Water Board  
([Weixing.Tong@waterboards.ca.gov](mailto:Weixing.Tong@waterboards.ca.gov))

Mr. David M. Bjostad  
Los Angeles Water Board  
([David.Bjostad@waterboards.ca.gov](mailto:David.Bjostad@waterboards.ca.gov))

Ms. Frances McChesney  
State Water Board  
([Frances.McChesney@waterboards.ca.gov](mailto:Frances.McChesney@waterboards.ca.gov))

Mr. David Coupe  
State Water Board  
([David.Coupe@waterboards.ca.gov](mailto:David.Coupe@waterboards.ca.gov))

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Ms. Jennifer Fordyce  
State Water Board  
([Jennifer.Fordyce@waterboards.ca.gov](mailto:Jennifer.Fordyce@waterboards.ca.gov))

Ms. Therese Barakatt  
State Water Board  
([Therese.Barakatt@waterboards.ca.gov](mailto:Therese.Barakatt@waterboards.ca.gov))

Mr. George Lockwood  
State Water Board  
([George.Lockwood@waterboards.ca.gov](mailto:George.Lockwood@waterboards.ca.gov))

Mr. James A. Leist  
Cardno ERI  
([james.leist@cardno.com](mailto:james.leist@cardno.com))

Mr. Patrick J. Toelkes  
Cardno ERI  
([patrick.toelkes@cardno.com](mailto:patrick.toelkes@cardno.com))